

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE  
STATE OF CALIFORNIA



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Order Instituting Rulemaking to Implement the )  
Commission's Procurement Incentive )  
Framework and to Examine the Integration of )  
Greenhouse Gas Emission Standards into )  
Procurement Policies. )  
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R.06-04-009  
(Filed April 13, 2006)

**REPLY COMMENTS OF CALPINE CORPORATION  
ON FINAL WORKSHOP REPORT ADDRESSING INTERIM EMISSIONS  
PERFORMANCE STANDARD PROGRAM FRAMEWORK**

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Pursuant to the October 5, 2006 Assigned Commissioner's Ruling, Calpine Corporation ("Calpine") respectfully submits these reply comments on the final workshop report addressing Commission Staff's proposed interim emissions performance standard ("EPS") program framework ("Final Workshop Report"). As Calpine has maintained throughout this proceeding, adopting the lowest possible EPS limit that will not compromise reliability and ensuring that the EPS applies to actual emissions from specified resources are critical to the successful implementation of Senate Bill ("SB") 1368 and the Commission's EPS program.

**I. ALLOWING R&D EXEMPTIONS FOR RESOURCES THAT DO NOT  
OTHERWISE MEET THE EPS IS INCONSISTENT WITH SB 1368**

Several parties, including Carson Hydrogen Power Project LLC ("Carson Hydro")<sup>1</sup> and PacifiCorp<sup>2</sup> support R&D exemptions for high emitting resources that would otherwise not meet the interim EPS limit. For example, PacifiCorp contends that, "[w]ithout an R&D exemption, California stands to lose out on the opportunity to obtain electricity from IGCC [integrated

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<sup>1</sup> See Carson Hydro's Opening Comments at 1-2. Carson Hydro was formed by affiliates of BP Alternative Energy and Edison Mission Energy for the purpose of constructing, owning, and operating a integrated gasification combined cycle ("IGCC") power plant.

<sup>2</sup> See PacifiCorp Opening Comments at 1-4

gasification combined cycle] facilities with carbon capture and storage. . . .”<sup>3</sup> Such a position, however, ignores the uncertainty associated with the commercial viability of carbon sequestration technology. Given that there is no assurance that an IGCC facility will ever be able to effectively sequester its associated carbon emissions, exempting carbon sequestration and other R&D projects from EPS compliance will serve only to exacerbate the problems SB 1368 seeks to address and undermine California’s long-term GHG reduction goals.

According to the Center for Energy and Economic Development (“CEED”) - *a group comprised of supporters of coal-fired generation* - CO2 sequestration technology is not commercially viable at the present time and cannot be used to satisfy the EPS:

Currently, no cost-effective technology exists to allow CO2 capture from flue gas streams and to store or sell the captured product. On the contrary, current CO2 capture and sequestration technology options are both highly energy intensive and far too expensive to be commercially implemented in order to satisfy the proposed EPS.<sup>4</sup>

CEED further acknowledges that carbon capture and sequestration technologies “are currently modest, and *years of intensive research remain before such technologies are commercially feasible.*”<sup>5</sup> While some parties believe that the “years of intensive research” needed to make sequestration technology commercially viable warrants an R&D exemption from the EPS, it is precisely because the viability of carbon sequestration and other potential carbon capture technologies is uncertain that the Commission should reject the R&D proposed by the Final Workshop Report.

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<sup>3</sup> PacifiCorp Opening Comments at 3.

<sup>4</sup> CEED Opening Comments at 15.

<sup>5</sup> CEED Opening Comments at 16 (emphasis added).

It is undisputed that the GHG emissions associated with traditional coal-fired generation are significantly above the EPS mandated by SB 1368.<sup>6</sup> As a result, absent any assurance that sequestration technology will be commercially viable in the near-term, an R&D exemption for IGCC facilities will simply allow long-term commitments with high polluting resources - in effect, rendering the EPS meaningless. Allowing long-term commitments with high polluting resources is wholly inconsistent with the goals of SB 1368.

Treating certain technologies differently than others, especially if the disparate treatment results in long-term commitments with high emitting resources, undermines policies aimed at reducing GHG emissions. Accordingly, if a resource does not meet the EPS limit at the time a load serving entity's ("LSE") commitment to the resource is proposed, the Commission should not approve a long-term commitment with that resource.

## **II. LONG-TERM COMMITMENTS WITH UNSPECIFIED RESOURCES IS INCONSISTENT WITH CALIFORNIA'S LONG-TERM GHG REDUCTION GOALS**

Several parties support the use of a proxy emissions level to determine EPS compliance for unspecified resources. While these parties disagree to some extent as to how the proxy should be calculated, they agree that unspecified resources should otherwise be eligible for long-term baseload commitments. Allowing long-term commitments with unspecified resources is inconsistent with California's long-term GHG reduction goals.

As a practical matter, backsliding can only be prevented if emissions can be measured. Because a proxy does not reflect the actual emissions from a resource, there is no way to determine whether a commitment with an unspecified resource is consistent with the goals of SB 1368. Furthermore, given that the use of a proxy *de-links* emissions from the emitting resource, it is entirely possible that the use of unspecified resources will significantly exacerbate the very

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<sup>6</sup> SB 1368 requires the Commission to establish an EPS that is "no higher than the rate of emissions of greenhouse

problem the EPS is trying to address by encouraging long-term commitments with high emitting resources. For example, adoption of a proxy level that would satisfy the EPS will encourage non-compliant resources to simply market themselves as unspecified resources because they would be assured of EPS compliance.

Any policy that could potentially increase long-term commitments with high emitting resources that might otherwise not meet the EPS should be rejected by the Commission. Accordingly, the Commission should require that all long-term commitments for baseload generation involve “specified resources” that can demonstrate compliance with the interim EPS.

### **III. THE EPS WILL NOT PRECLUDE OUT-OF-STATE RESOURCES FROM COMPETING IN THE CALIFORNIA MARKET**

CEED asserts, as it has in its prior comments, that the adoption of the EPS proposed in the Final Workshop Report will effectively preclude out-of-state coal-based generation from competing in the California markets.<sup>7</sup> For example, CEED contends that “[u]nder the proposed EPS, the ability of out-of-state coal-fueled generation plants to export their electricity into California will be severely limited, if not foreclosed altogether.”<sup>8</sup> CEED is wrong.

Essentially, the EPS functions as a “bright line” test with respect to the level of emissions allowable for long-term commitments for baseload generation. The EPS does not treat generation resources differently depending on location nor does it distinguish between generation technologies. Thus, all else being equal, an out-of-state generation resource (whether IGCC or CCGT) will have the same market opportunities as an identical resource located in California. In other words, both out-of-state and in-state resources will be required to meet the same EPS limit.

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gases for combined-cycle natural gas baseload generation. *See* Pub. Util. Code § 8341(d)(1).

<sup>7</sup> CEED Opening Comments at 17.

<sup>8</sup> CEED Opening Comments at 19.

In addition, because the EPS, by definition, will apply only to long-term baseload generation, resources that do not meet the EPS limit will still have an opportunity to participate in the California energy market. Specifically, LSEs will continue to be able to enter into non-baseload, short-term and intermediate-term commitments with non EPS compliant resources. Thus, market opportunities will continue to exist for even the highest emitting resources. Given that the EPS will not shut resources out of the market, the Commission should reject CEED's proposed revisions to the Final Workshop Report.

#### **IV. THE EPS SHOULD NOT BE INCREASED**

Several parties support increasing the EPS above the 1,100 lbs CO<sub>2</sub>/MWh proposed in the Final Workshop Report. Calpine urges the Commission to reject requests to increase the EPS limit above 1,100 lbs.

As Calpine discussed in its Opening Comments on the Final Workshop Report, the fundamental purpose of SB 1368 is to prevent “backsliding” while the Commission and other State regulatory agencies develop and implement longer term programs to mitigate the environmental impacts associated with GHG emissions. As a result, the types of long-term resource commitments LSEs make during this interim period will be a key factor in California's ability to successfully achieve long-term GHG reductions. Specifically, the more CO<sub>2</sub> emissions increase in the near-term, the more difficult it will be to realize the State's longer-term emissions reduction goals. Thus, to better ensure that California meets its long-term GHG reduction goals, the Commission should adopt the lowest possible EPS.

Reducing the EPS to 1,000 lbs CO<sub>2</sub>/MWh (as opposed to raising the limit) would be more consistent with SB 1368 in that 1,000 lbs CO<sub>2</sub>/MWh represents a reasonable approximation of the emissions of a combined cycle natural gas turbine (“CCGT”) and would not limit the availability of long-term baseload generation resources necessary to meet the State's

future reliability needs. As noted in the Draft Workshop Report, an EPS of 1,000 lbs CO<sub>2</sub>/MWh “[will] allow[] for high performing existing CCGTs to qualify and is significantly above the average emissions reported for gas plants within and outside of the state.”<sup>9</sup>

Given that SB 1386 deems all existing CCGTs compliant with the EPS, an EPS limit of 1,000 lbs CO<sub>2</sub>/MWh will allow LSEs to meet their respective reliability needs without committing the State to new long-term commitments with high-polluting resources. This approach is consistent with the goals of SB 1368 and the California’s long-term GHG reduction goals. Accordingly, the Commission should reject requests to set the EPS above 1,000 lbs CO<sub>2</sub>/MWh.

**V. THE EPS SHOULD APPLY TO ANY INVESTMENT IN AN UTILITY-OWNED BASELOAD RESOURCE INTENDED TO EXTEND THE LIFE OF, AND/OR INCREASE THE RATED CAPACITY OF, THE RESOURCE**

Southern California Edison (“SCE”) contends that SB 1368 does not apply to investments in existing utility-owned resources that are intended to extend the life of, and/or increase the rated capacity of, the resource.<sup>10</sup> Under SCE’s interpretation, an existing utility-owned generation facility would not have to satisfy the EPS even if the facility was continually rebuilt and its useful life extended indefinitely. SCE’s position is inconsistent with the fundamental goals of SB 1368 and should be rejected.

As discussed above, a primary goal of SB 1368 is to prevent long-term commitments with high polluting baseload generating resources while the Commission and other State regulatory agencies develop and implement longer term programs to reduce GHG emissions. Allowing a utility to make a financial commitment to extend the life of a baseload, utility-owned resource without requiring EPS compliance simply compromises this goal. Indeed, there would

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<sup>9</sup> Draft Workshop Report at 28.

<sup>10</sup> SCE Opening Comments at 5-6.

be no restriction – at least from a GHG policy perspective - from a utility continuing to invest in, and extend the life of, its most polluting resources. Encouraging investment in high polluting resources is contrary to SB 1368. Accordingly, the Commission should reject SCE’s attempt to exempt investments in existing utility-owned resources from EPS compliance.

## **VI. CONCLUSION**

For the reasons discussed herein, the Commission should (1) prohibit R&D exemptions for resources that cannot meet the EPS limit, except in the limited case where a strong showing is made that a non-compliant resource is necessary for reliability purposes; (2) require that all long-term commitments for baseload generation involve “specified resources” that can demonstrate compliance with the EPS limit; (3) reject requests to increase the EPS; and (4) require that investments in existing utility-owned resources are subject to the EPS.

Respectfully submitted,

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## **CERTIFICATE OF SERVICE**

I, Judy Pau, certify:

I am employed in the City and County of San Francisco, California, am over eighteen years of age and am not a party to the within entitled cause. My business address is 505 Montgomery Street, Suite 800, San Francisco, California 94111.

On October 27, 2006, I caused the following to be served:

### **REPLY COMMENTS OF CALPINE CORPORATION ON FINAL WORKSHOP REPORT ADDRESSING INTERIM EMISSIONS PERFORMANCE STANDARD PROGRAM FRAMEWORK**

via electronic mail to all parties on the service list R.06-04-009 who have provided the Commission with an electronic mail address and by First class mail on the parties listed as "Appearance" and "State Service" on the attached service list who have not provided an electronic mail address.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct, and that this declaration was executed on the date above at San Francisco, California.

/s/ Judy Pau

Judy Pau

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